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From: Walton, David
Sent: Sunday, January 15, 2023 2:41 PM
To: Lance Pope <lpope@pbsjlaw.com>
Cc: Lund, Juli <JLund@wc.com>; Grisham, Greg <ggrisham@fisherphillips.com>; Winsman, Edward <ewinsman@fisherphillips.com>; Mirmira, Vidya <VMirmira@wc.com>
Subject: Ridley

Lance –

As your predecessor counsel (Ryan Holt) indicated, Mr. Ridley had a copy of a personal hard drive that Mr. Holt imaged. During one of our recent meet-and-confer calls, you denied that Mr. Ridley ever had such an external drive but indicated that you would check with Mr. Holt. At the very beginning of this case, Vidya indicated that Mr. Ridley used this personal drive to back-up his Nalco computer and had possession of this drive during, at least some, parts of his employment with ChemTreat.

For obvious reasons, we need to have access to an image of this drive to test these assertions and look for other relevant forensic artifacts. Let us know when you will send us an image of this drive (we would actually like it sent directly to our forensic examiner, Larry Lieb). To the extent there is personal information on the drive, we are willing to discuss a potential protocol where Mr. Lieb would search for Nalco/Ecolab materials and other forensic artifacts without disclosing truly personal and irrelevant materials.

Please treat this as our attempt to fulfill our meet-and-confer obligation before we file a motion to compel to secure a copy of the image.

Thank you.

Dave



David Walton

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